

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Alexander Nelson,

Case No. 23-cv-525 NEB/JFD

Plaintiff,

**AMERICAN MODERN INSURANCE
GROUP, INC.'S MOTION TO
COMPEL COMPLIANCE WITH
RULE 45 SUBPOENA TO NON-
PARTY ANN OLSON**

v.

American Modern Insurance Group, Inc.,
NCM Insurance Agency, LLC,

Defendants.

Defendants American Modern Insurance Group, Inc. (“American Modern”), by and through its counsel, hereby moves this Court, pursuant to Federal Rule of Civil Procedure 45 for an Order (a) compelling non-party Ann Olson to produce all responsive documents and information in response to Defendants’ Rule 45 Subpoena Duces Tecum, and (b) compelling Ann Olson to sit for an in-person deposition at the undersigned counsels’ office at a date to be determined based on Ms. Olson document production and availability.

This Motion is based upon the record in the case as well as American Modern’s opening Memorandum of Law, the Declaration of Diego E. Garcia and all exhibits thereto, American Modern’s Reply Memorandum of Law (if one is filed), and arguments of counsel.

This Motion is accompanied by (a) American Modern’s Notice of Hearing, (b) American Modern’s Opening Memorandum of Law, (c) American Modern’s Word Count Certificate, (d) American Modern’s L.R. 7.1(a)(1) Meet-and-Confer Statement, (e) the Declaration of Diego E. Garcia and all exhibits thereto, (f) a certificate of service, and (g)

a Proposed Order granting this Motion, of which an editable version is being emailed concurrently with this filing to Chamber in accordance with the Local Rules.

Dated: March 14, 2024

/s/ Diego E. Garcia
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